

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
ROANOKE DIVISION**

ELMO AUGUSTUS REED,)
v.)
Plaintiff,)) CIVIL ACTION NO.
v.) 7:16-cv-00547
MARK AMONETTE,)
BERNARD W. BOOKER, and)
PAMELA SHIPP,)
Defendants.)

**MEMORANDUM IN SUPPORT OF DEFENDANTS' MOTION TO SUBSTITUTE
COUNSEL OF RECORD**

COME NOW Defendants Mark Amonette, Bernard W. Booker, and Pamela Shipp, by counsel, and submit the following Memorandum in Support of their Motion to Substitute Counsel of Record.

Jessica Berdichevsky and the Office of Attorney General initially was assigned to represent the interests of Defendants Amonette, Booker and Shipp in this litigation. Due to unforeseen medical reasons, Ms. Berdichevsky is not able to continue the representation of these individuals in the litigation and has requested outside counsel continue in defending the case on behalf of these defendants. Accordingly, the Defendants request the court substitute Edward J. McNelis, III, and Elizabeth M. Muldowney of the law firm RawlsMcNelis as attorneys of record for Defendants:

In addition, the Defendants request that the court permit Jessica Berdichevsky and the Office of Attorney General to withdraw as counsel of record for Defendants. The Defendants consent to this Motion and asks that it be granted.

FOR THE FOREGOING REASONS, Defendants Mark Amonette, Bernard W. Booker, and Pamela Shipp respectfully request that this Court grant the Motion to Substitute Counsel of Record and substitute Edward J. McNelis, III, Elizabeth M. Muldowney, and the law firm of RawlsMcNelis, PC, as counsel of record in this matter. Further, the Defendants request the Court permit Jessica Berdichevsky to withdraw as counsel of record. A proposed order is attached as Exhibit 1.

Respectfully submitted,
MARK AMONETTE
BERNARD W. BOOKER
PAMELA SHIPP

/s/
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CERTIFICATE OF SERVICE

I certified that on the 13th day of June, 2017, I electronically filed the foregoing document using the ECF filing system which provided notification of the filing to the following ECF users:

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